

1) Review of Previous Meeting Minutes

There were no substantial comments from the August 23, 1994 team meeting. The comments that team members faxed to Phil Nixon were generally incorporated to the team's satisfaction.

It was generally stated by Harlen Ainscough and Arturo Duran that the August 23, 1994 team meeting had successfully provided CDPHE and EPA managers with adequate and accurate information.

2) Incorporating Sludge/Pondcrete in the IM/IRA

Harlen Ainscough stated that since wastes were illegally dispositioned in the Solar Evaporation Ponds in 1987/1988, the CDPHE has the authority to issue an enforcement action and require the DOE to remove the sludge and close the SEPs in a manner dictated by the CDPHE. Frazer Lockhart did not dispute the CDPHE's authority to require an enforcement action, but indicated that the CDPHE has not elected to take this closure approach for the last 6 years and has previously supported closing the SEPs under 40 CFR 265 interim status closure requirements. Frazer Lockhart pointed out that only SEP 207-C received wastes illegally, and that the CDPHE was aware that the wastes were put into the SEP at that time. It was discussed that the DOE will continue to design the closure to meet the interim status closure requirements unless the CDPHE issues an enforcement action under 40 CFR 264.

Frazer Lockhart specified that the DOE is planning to move forward with incorporating pondcrete as a component of the IM/IRA. He acknowledged that DOE needed to model this scenario, and indicated a commitment to perform the risk analysis modeling. The DOE expects the modeling results to be positive. The DOE considers that the inclusion of pondcrete in the IM/IRA is consistent with the regulations. Harlen Ainscough indicated that the CDPHE does not agree that inclusion of the pondcrete is regulatorily acceptable because the pondcrete is not remediation waste. Harlen Ainscough stated that the pondcrete has been sitting on the 750 pads for 6 years and its inclusion beneath the engineered cover has nothing to do with the IM/IRA. He indicated that including wastes that are not necessary to include as a result of the remediation could trigger the Minimum Technology Requirements (with or without the adoption of the Corrective Action Management Unit). The CDPHE considers that there is no basis for including the pondcrete as remediation waste. Harlen added that a regulated unit (750 pad) can be included into a Corrective Action Management Unit if the regulated unit is undergoing closure, and there is a demonstrated enhancement to the closure. Kathy London stated that the 750 Pad is specified in the IAG as a unit requiring closure. In addition, the pondcrete is chemically similar to the sludge which can be consolidated beneath the engineered cover and be protective of human health and the environment (if demonstrated by risk analysis). Steve Howard stated that the 750 pad could be closed early since saltcrete (currently stored on the 750 pad) is scheduled for shipment to Envirocare for disposal in January (1995) and the pondcrete could be dispositioned within the OU4 IM/IRA. Harlen Ainscough indicated that if DOE was willing to close the 750 Pad, then a formal commitment should be documented. Frazer Lockhart added

that the potential for early closure of the 750 pad would be an enhancement. The DOE has provided correspondence to the CDPHE and EPA requesting approval for OU4 to annex OU10 (including the 750 pad). It was noted that the 750 pad is currently operating under interim status and can be closed under interim status as well. If the sludge/pondcrete can not be dispositioned as components of the IM/IRA, then an operating permit would be required because the wastes would require storage for 3-4 years. Harlen Ainscough indicated that the request to annex OU10 into OU4 had not been acted upon by CDPHE because the agency expected that the 750 pad would become a permitted unit. Arturo Duran stated that the EPA had not previously favored OU4 annexing the 750 pad because it could not be closed according to the same schedule as the OU4 closure. Steve Howard indicated that the 750 pad should be a part of OU4 since it was storing OU4 wastes. Harlen Ainscough remarked that the CDPHE considers that the 750 pad is not currently closing and considers that the 750 pad would be needed for future waste storage and should therefore be permitted for future storage. Building 964 was cited as an example. Steve Howard indicated that this may not be the case. It was discussed that a condition of interim status requires that the DOE submit a permit modification to include the 750 pad as a regulated unit.

Frazer Lockhart stated that the DOE has asked the Citizens Advisory Board (CAB) to consider three related topics:

- 1) Waste Disposal at the RFETS
- 2) Remediation Waste Disposal at the RFETS
- 3) Process Waste Disposal at the RFETS

It was discussed that these will be three issues that the public may have to wrestle with in the near future. The CAB may have some feedback as early as the middle of September. Arturo Duran stated that wastes should not be segregated by regulatory classification to determine if they can be disposed onsite. Rather, a risk based approach should be used to determine if onsite waste disposal would be protective of human health and the environment on a case by case basis.

3) Slurry Wall vs. Subsurface Drain

Arturo Duran provided comments on the slurry wall report and stated that the report failed to demonstrate that a slurry wall could not be effective (there was not a fatal flaw). It was discussed that DOE, CDPHE, EG&G, and ES would review the comments and would discuss how to resolve the comments at the next team meeting. Frazer Lockhart indicated that continuing research and development on the slurry wall would require the diversion of resources that are currently providing other services to the baseline design.

4) PRG Issue

Phil Nixon discussed that one of the EPA/PRC comments on the draft proposed IM/IRA-EA Decision Document indicated that the calculation to Preliminary Remediation Goals (PRGs) using

target organs was not appropriate with respect to the EPA's Risk Assessment Guidance. Phil Nixon stated that the working group had selected the target organ approach based on a draft guidance policy of the CDPHE (which has recently been modified to delete the target organ approach). The comment referred to the forward risk assessment process specified in the EPA Risk Assessment Guidance, which does not apply to the calculation of PRGs. The EPA guidance for PRG calculations specifies a level of 1.0×10^{-6} for the calculation. The working group was extra conservative by dividing the result by the number of COCs that effect the same target organ. The EPA/PRC comment indicated that the PRG risk calculation results should be divided by the total number of COCs instead of the number of COCs that impact a target organ. ES re-calculated the PRGs based on dividing the risk result by the total number of COCs and determined that the PRGs generally decrease by an order of magnitude for the organic and metal COCs. The radionuclide PRGs stay about the same. No new COCs would be added to the list. It was determined that if the new PRGs were adopted, there would be no change to the closure strategy. No additional soils would need to be excavated, and the proposed design would not change. One potential drawback to lower PRG values is that it could be difficult to procure an onsite field laboratory to detect these levels in an expeditious manner. Kathy London suggested that since there was no change to the closure/remediation strategy that the old PRGs should be retained in the IM/IRA-EA Decision Document. However, the working group would be able to respond to any comments on this issue that were brought forth by the public. Frazer Lockhart indicated that the DOE would like to see some value added to the IM/IRA-EA Decision Document if the money and time were going to be spent to update it with new PRGs. It was agreed that Harlen Ainscough and Arturo Duran would discuss this issue with their colleagues at the CDPHE and EPA respectively, and a path forward would be determined at the next team meeting.

5) Other Issues

It was agreed that the schedule for the revised IAG milestones would be discussed at the next team meeting. The duration of the review cycles will be a major point of discussion.

Harlen Ainscough stated that there was a second Technical Review Group (TRG) Meeting scheduled for the end of September. There are certain topics that will be raised during these discussions.

- 1) DOE needs to strategize how the excavation and transportation of soils will be conducted with respect to the release of dust to the atmosphere.
- 2) The type of air monitoring during construction needs to be conceptually developed.
- 3) The TRG requested information on the slurry wall.

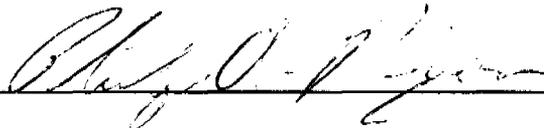
It was discussed that perhaps the EPA has issued guidance on dust suppression on large remediation projects. Team members will look into any existing data.

Harlen Ainscough indicated that Fred Dowsett had requested specific data at the August 23, 1994 team meeting.

- 1) The percentage of sludge that exceeded the LDR concentrations. Kathy London reported that 100 percent of the sludge samples exceeded the LDR concentrations. The key contaminants include Cadmium and Nickel.
- 2) The percentage of pondcrete that exceeded the LDR concentrations. Kathy London stated that a statistical analysis was conducted on representative block, and that 100 percent of the blocks exceeded the LDR concentrations.

The annexation of OU10 and IHSS 176 need to be discussed at the next team meeting.

Harlen Ainscough requested that ES investigate running the DOE RESRAD model. Phil Nixon indicated that the EPA/PRC had rejected the use of the RESRAD code because it did not follow the EPA risk assessment guidance. This topic will be addressed at the next team meeting.



Philip A. Nixon